

1 there where she said hairstylist for ten years or she  
2 met -- or next whatever -- whatever said I would  
3 probably put in -- the next -- next part of the  
4 conversation is -- I have to go back and look -- but I  
5 would -- I would just put in a note there and the  
6 things -- and then I would -- again, I would expand on  
7 those --

8 Q Okay.

9 A -- as far as building my -- building my  
10 notes.

11 Q Okay.

12 A **Building my report notes.**

13 Q So the first time you would have tried to  
14 note down either typing or with a pen or a pencil or a  
15 magic marker or a crayon or anything what Ms. [REDACTED]  
16 told you would have been at least six and a half hours  
17 after the interview had ended?

18 A No, sir. I -- like I say, I -- 3:00 o'clock  
19 -- I say four, four and a half.

20 Q Well, 9:00 o'clock to -- to 3:30 would be  
21 six and a half, right?

22 A Yes, sir, it would be.

23 Q So -- so at least six and a half hours  
24 elas -- elapsed between the time the interview ended  
25 and you started putting anything down?

1       **A**    Some time in between that.

2       **Q**    Okay. And at 3:30 in the morning you're not  
3    sure you were taking -- started that at all? You're  
4    just guessing?

5       **A**    I'm not guessing.

6       **Q**    You're not guessing?

7       **A**    No. I'm saying it probably was about that  
8    time when I got up, about 3:30.

9       **Q**    And -- and are you definitive that when you  
10    got up at somewhere around 3:30 you started typing?

11      **A**    Absolutely, sir.

12      **Q**    You had your laptop with you?

13      **A**    Yes, sir.

14      **Q**    Okay. You started typing and at that point  
15    you just typed little tidbits. Is that what you said?

16      **A**    That's what I was doing.

17      **Q**    Okay. So you didn't write a full report --

18      **A**    No. No, sir.

19      **Q**    You weren't writing complete sentences or  
20    anything?

21      **A**    No, sir.

22      **Q**    Okay. And how was it you were able to  
23    remember what she told you during the interview six  
24    and a half hours earlier?

25      **A**    Mr. Martin, I just have a knack for just --

1 just remembering what was said to me. That's why I go  
2 and write my reports as it is. I don't make a lot of  
3 -- I write them as I recall them so -- and that's just  
4 the way it's been.

5 Q Okay. Do you remember the first five  
6 questions that I asked you during this deposition?

7 A You asked me about the documents and had I  
8 seen the exhibit -- those --

9 Q Well, I'm asking specifically. Do you  
10 remember the specific questions that I asked you just  
11 a few hours earlier this morning?

12 A No, sir, I didn't.

13 Q So you don't really have a memory that  
14 remembers the details of what went on, do you?

15 A For that particular interview, yes, sir, I  
16 do.

17 Q Well, why are you so confident of that?

18 A Because I listen to what she had to say, and  
19 I -- and I guarantee that that's what she told me.

20 Q You guarantee it?

21 A I'm confident, sir. I am confident.

22 Q And so what -- when did you go back next to  
23 make further additions or modifications to this  
24 document that you were adding tidbits of thought to?

25 A Any time between -- off and on -- any time

1 between the time I started until I finally sent -- I  
2 finally made -- made my -- my -- made my final report  
3 on those -- on those -- on that interview. It's gone.  
4 Slouch down, huh.

5 Q Okay. So -- so how much time exactly --  
6 January 30th is when you started, and we didn't get  
7 them until March. We didn't get your report on  
8 Ms. [REDACTED] until March. So was it over a month or  
9 really over two months that it took you to finish that  
10 report?

11 A Yes, sir.

12 Q And all that time you relied on nothing but  
13 your memory?

14 A Yes, sir.

15 Q And how long was the report when you first  
16 put in the tidbits on January 30th?

17 A Probably page, page and a half of just  
18 bullet -- just my little tidbit notes.

19 Q Okay. Just bullets, that's it?

20 A Yeah. It -- it -- it discussed, like I  
21 said, date, times and -- and just her comments -- the  
22 comments she made.

23 Q So between January 30th and March were you  
24 doing other work besides drafting this report of  
25 interview of [REDACTED]?